

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MICHAEL KANE, et al.,

Case No. 21-cv-7863 (VEC) (Lead)

Plaintiffs,

- against -

THE CITY OF NEW YORK et al.,

Defendants.

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MATTHEW KEIL, et al.

Case No. 21-cv-7863 (VEC)

Plaintiffs,

- against -

THE CITY OF NEW YORK et al.,

Defendants.

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DECLARATION OF NATASHA SOLON

Natasha Solon declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a named Plaintiff in the above-referenced consolidated action.
2. I respectfully submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction currently before the Court.
3. I know the facts stated herein to be true based upon my personal knowledge, except for statements which are made on information and belief and, as to those, I verily believe them.
4. I am an Assistant Principal working for the New York City Department of Education.

5. In October, 2021, I was involuntarily suspended for failing to get vaccinated in violation of my sincerely held religious beliefs.
6. After the Second Circuit held that the DOE's religious exemption policy was unconstitutional, I was able to apply for reconsideration by the Citywide Panel. The email sent to me stated that we did not need to submit anything because they would rely on the original material.
7. I received no response for months. Meanwhile my situation became desperate.
8. I depleted all of my savings, my son had to take a leave of absence from school because I could not pay the parental portion of tuition, and my children and I were running out of food, and on the brink of losing our home.
9. I owed over \$2,000 in heating bills.
10. I applied to over sixty jobs during this period. Despite my extensive qualifications and spotless record, few positions called me back, and none offered me a job.
11. Finally, during an interview in Westchester, the woman conducting the interview took pity on me. She told me she liked me and wished she could hire me.
12. However, she said she had to be honest with me – neither she nor anyone else would be able to hire me.
13. I asked why. She said that there was a “problem” code in the system flagging my name. Outside schools cannot see the reason for the code, other than there is a problem flagged indicating not to hire. Examples she gave me of typical problem codes arose from robbery and other serious misconduct.
14. I have a spotless record and was shocked to find out about this code.

15. I investigated further and learned that the internal records at the DOE showed the reason for the problem code was that I was not vaccinated.
16. My situation grew more desperate every day, and it soon became clear that I would get no other work while this code remains.
17. Finally, to save my family and our home, I took the vaccine, which is against my sincerely held religious beliefs.
18. Within twenty-four hours of submitting my paperwork to the DOE, I was reinstated, and the problem code was removed.
19. Even though I felt I had no choice, this decision has been deeply traumatic and continues to cause irreparable harm.
20. I pray every day for help to overcome my anger, pain, and guilt for having to violate my faith.
21. The experience continues to impact me and to cause me serious distress.
22. I do not feel safe at my job. I do not feel safe in society.
23. The fact that the courts would continue to uphold this brazen unconstitutional condition and fail to intervene to protect us as we lose everything we have worked so hard to achieve continues to shake my faith in this country.
24. If, as the Second Circuit admitted, the DOE violated the Constitution, how can this Court or any other continue to allow the DOE to continue to harm so many of us for not taking the vaccine?
25. I am vaccinated now, but when the inevitable booster requirement comes, I will have to go through all of this again. I do not think that I can violate my faith again. The harm it caused me to do it to save my family was too severe.


26. I only hope that this Court intervenes before that occurs, or at least intervenes before more of my colleagues are forced to be violated the way I was.

27. This is spiritual rape. There is no other way to put it. I did not consent to this.

28. This Court must help us to stop the continuing injustice.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 20, 2022


By: Natasha Solon